

Jackson Legal Group P.C.  
807 Kings Highway  
Suite 2  
Brooklyn, NY 11223  
P 718.872.7407 F 718.872.7408

November 16, 2018

**VIA ECF**

Magistrate Judge Steven L. Tiscione  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re:** Janine Linton v. Frontier Airlines, Inc.  
Index No.: 18 CV 00044

Dear Judge Tiscione:

We represent the Plaintiff in the referenced action and write on behalf of both parties to provide Your Honor with a request for an adjournment for an extension of time.

As of right now, the exchange of expert reports is to be completed by November 19, 2018. We would like to extend the exchange of expert reports by 30 days due to conflicts in scheduling as the holiday season approaches. The suggested adjournment date is December 19, 2018. This adjournment will affect the deadline for expert depositions, completion for all discovery, and the final date to take dispositive motion practice by approximately 30 days. The suggested date for the deadline expert depositions would be January 21, 2019, for completion for all discovery, January 31, 2019, and for the final date to take dispositive motion practice, February 28, 2019.

The Plaintiff and Defense counsel previously made a request to adjourn the settlement conference, which was granted. The Defendant consents to the above deadline extension requests.

Your Honor's attention to this matter is greatly appreciated.

Respectfully,

  
Janai Jackson, Esq.

cc: **VIA ECF**

Michael J. Crowley  
Michael Bojbasa  
*Attorneys for Defendant*  
Frontier Airlines Inc.  
888 Seventh Avenue – 9<sup>th</sup> Floor  
New York, New York 10106